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*Attorneys for WM Pool-High Yield Fixed Interest Trust*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

_____	)	
In re	)	Chapter 11 Case
	)	
MOTORS LIQUIDATION COMPANY, et al.,	)	Case No. 09-50026 (REG)
	)	
Debtors.	)	(Jointly Administered)
_____	)	
MOTORS LIQUIDATION COMPANY	)	
AVOIDANCE ACTION TRUST, by and	)	Adversary Proceeding
Through Wilmington Trust Company, solely	)	
in its capacity as Trust Administrator and	)	Case No. 09-00504 (REG)
Trustee,	)	
Plaintiff,	)	
vs.	)	
	)	
JPMORGAN CHASE BANK, N.A., et al.,	)	
	)	
Defendants.	)	
_____	)	

**WM POOL-HIGH YIELD FIXED INTEREST TRUST'S  
MOTION TO QUASH SERVICE OF PROCESS  
AND VACATE THE CERTIFICATE OF DEFAULT**

WM Pool-High Yield Fixed Interest Trust ("WM") hereby moves to quash service of process and vacate the certificate of default entered against it under Federal Rule of Civil Procedure 12(b)(5) and Federal Rule of Bankruptcy Procedure 7012(b). The grounds in support of this motion are set forth in WM's simultaneously-filed Memorandum of Law in Support of WM Pool-High Yield Fixed Interest Trust's Motion to Quash Service of Process and Vacate the Certificate of Default.

Dated: June 17, 2016

Respectfully submitted,

/s/Scott S. Balber  
Scott S. Balber

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Trustee,	)	
Plaintiff,	)	
vs.	)	
JPMORGAN CHASE BANK, N.A., et al.,	)	
	)	
Defendants.	)	
_____	)	

**[PROPOSED] ORDER GRANTING WM POOL-HIGH YIELD  
FIXED INTEREST TRUST'S MOTION TO QUASH SERVICE  
OF PROCESS AND VACATE THE CERTIFICATE OF DEFAULT**

Upon the motion of WM Pool-High Yield Fixed Interest Trust, it is hereby

ORDERED that service of process as to WM Pool-High Yield Fixed Interest Trust  
hereby is quashed, and it is further

ORDERED that the certificate of default entered against WM Pool-High Yield  
Fixed Interest Trust hereby is vacated.

Dated: New York, New York

\_\_\_\_\_, 2016

SO ORDERED:

\_\_\_\_\_  
HON. ROBERT E. GERBER